

Exhibit 16

Pennsylvania Department of Environmental
Protection, Emergency Response Incident
Report (Feb. 13, 2023).

PA DEP – EMERGENCY RESPONSE INCIDENT REPORT

INCIDENT			
Brief Description:	ERT response to malfunction causing visible emissions at Shell Chemicals, Potter Twp, Beaver County		
Incident Date & Time:	1528 on 2/13/2023		
Weather Conditions:	Clear & dry, 50 degrees F		
LOCATION			
County:	Beaver County		
Municipality:	Potter Township		
Address / Directions:	300 FRANKFORT RD MONACA, PA 15061-2210		
Latitude / Longitude:	Lat:	Lon:	Data Source:
POTENTIAL RESPONSIBLE PARTY			
Contact Person:	KIMBERLY KAAL, Environmental Manager or Jim Sewell, Environmental Manager		
Company / Organization:	SHELL CHEM APPALACHIA LLC		
Address:	300 FRANKFORT RD MONACA, PA 15061-2210		
Phone Number:	(724) 709 - 2467 or (303) 902-7739		
PROPERTY OWNER / FACILITY CONTACT			
Contact Person:	same as RP		
Company / Organization:			
Address:			
Phone Number:			
INSURANCE COMPANY INFORMATION			
Contact Person:	n/a		
Company:			
Phone Number:			
Policy Number:			
TRANSPORTATION RELATED INFORMATION			
Carrier Contact Person:	n/a		
Carrier Company:			
Carrier Address:			
Carrier Phone Number:			
License Plate:	Truck / Tractor:	Trailer:	DOT #:
Police Report:	Police Dept.:	Report #:	
CLEANUP CONTRACTOR			
Contact Person:	n/a		
Company / Organization:			
Address:			
Phone Number:			
DEP Emerg. Contract:	<input type="checkbox"/> Yes <input type="checkbox"/> No Estimated Cost: \$		
OTHER AGENCIES INVOLVED			
Agency	Contact Person	Phone Number	
n/a			

OBSERVATIONS / REMARKS

SHELL CHEM APPALACHIA LLC reported a malfunction to PADEP at 1538 on 2/13/2023. Ethane Cracking Unit (ECU) and subsequent compressor failure led to a malfunction with material being sent to the flares to combust. Shell reported visible emissions from the flares. PADEP received complaint calls concerning observed visible emissions from the flares and I was dispatched by ERT at 1734 on 2/13/2023. I arrived on site at Gate #3 of Shell Chemicals at 1818 on 2/13/2023. I observed visible emissions from the High Pressure Ground Enclosed Flare (C205B). I did not observe any visible emissions from the Elevated Flare (C205C) (only steam) or the other High Pressure Ground Enclosed Flare (C205A). I did not observe any visible emissions or fugitive emissions from any other source on site. I did not observe any malodor emissions downwind of Shell Chemicals in Center Township or Monaca. I did not observe any malodor emissions in Potter Township or on Shell Chemicals property. Shell Chemicals security approached me at 1837. I informed them I would need to speak to a manager on site tonight to discuss the malfunction. I observed visible emissions from C205B continuously from 1820 to 1848 when we left to drive to the Admin. building. I took three photographs of the Elevated and Ground Enclosed Flares from 1820 through 1826. These photos were taken after sunset so I did not attempt a Method 9 reading.

I spoke with Jim Sewell and Jason Shultz of Shell Chemicals. We discuss the malfunction. Jim said the malfunction started at 1525 today. He said that C205A was offline for maintenance so all of the material was sent to the Elevated Flare (C205C) and the other High Pressure Ground Flare (C205B). He said that visible emissions were observed from 1525 through 1813 from C205C but not continuously visible. Visible emissions from C205B are continuing. Jim stated that the C205C flare also broke its glycol seal, venting a mixture of water and glycol onto Shell Chemical's property. They did survey the area and did not observe any of the glycol/water mixture on the public road or adjacent river. Shell will resume their investigation in the morning when its light. Shell Chemicals will contact PADEP Clean Water to report the glycol/water release.

I was also contacted by two previous Shell Chemicals complainants tonight informing me of the visible emissions from flaring. A news reporter also called me and left a message. I contacted Beth Speicher, PADEP Air Quality, and informed her of my observations tonight and also of the contacts by the complainants and the news reporter. I forwarded the news reporter's voicemail to Beth Speicher.

DEP INCIDENT TYPE					
<input checked="" type="checkbox"/> Air Contamination		<input type="checkbox"/> Land Contamination / Waste		<input type="checkbox"/> Mining Incident	
<input type="checkbox"/> Radioactive Material		<input type="checkbox"/> Storage Tank Incident		<input type="checkbox"/> Water Contamination	
<input type="checkbox"/> Other or Non-DEP Incident:				<input type="checkbox"/> Oil or Gas Well Incident	
				<input type="checkbox"/> Water Supply Contamination	
RELEASE TYPE					
<input type="checkbox"/> Discharge / Release		<input type="checkbox"/> Dumping / Disposal		<input type="checkbox"/> Fire Related	
<input type="checkbox"/> None		<input type="checkbox"/> Spill		<input type="checkbox"/> Unknown	
<input checked="" type="checkbox"/> Other: VE from flaring					
MEDIA AFFECTED					
<input checked="" type="checkbox"/> Air		<input type="checkbox"/> Land		<input type="checkbox"/> Surface Water	
		<input type="checkbox"/> Ground Water		<input type="checkbox"/> Within Facility Only	
				<input type="checkbox"/> None	
Waterway:				<input type="checkbox"/> Affected <input type="checkbox"/> Threatened	
Area of Stream Affected:		<input type="checkbox"/> None or N/A <input type="checkbox"/> See OBSERVATIONS / REMARKS section.			
Public Water Supply:				<input type="checkbox"/> Affected <input type="checkbox"/> Threatened <input type="checkbox"/> Notified	
Public Sewage Treat.:				<input type="checkbox"/> Affected <input type="checkbox"/> Threatened <input type="checkbox"/> Notified	
Endangered Species Impacted:		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown		Species:	
Endangered Species Habitat Impacted:		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown		Species:	
Cultural Resource Impacted:		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown		Type:	
Migratory Bird Impacted:		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown		Species:	
SUBSTANCES(S) INVOLVED					
Substance	CAS Number	Lowest Published Exp. Limit	Total Amt Involved	Amt. Released	Amt. Recovered
SOURCE OF MATERIAL					
<input type="checkbox"/> Above Ground Storage Tank		<input type="checkbox"/> Highway - Cargo		<input type="checkbox"/> Highway -Fuel / Fluids	
<input type="checkbox"/> Mining / Quarry		<input type="checkbox"/> None		<input checked="" type="checkbox"/> Industrial / Commercial	
<input type="checkbox"/> Railway (Train)		<input type="checkbox"/> Residential / Community		<input type="checkbox"/> Oil / Gas Well	
<input type="checkbox"/> Vessel (Boat)		<input type="checkbox"/> Other:		<input type="checkbox"/> Pipeline	
				<input type="checkbox"/> Unknown	
MONITORING INFORMATION					
Monitoring Conducted:		<input type="checkbox"/> Air <input type="checkbox"/> Radiation <input type="checkbox"/> Water Quality			
Monitoring Results:		<input checked="" type="checkbox"/> None or N/A <input type="checkbox"/> See OBSERVATIONS / REMARKS section.			
SAMPLE INFORMATION					
Sample(s) Collected:		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Sample Description(s):					
DEP MATERIALS / EQUIPMENT USED (Sorbents, Test Strips, Meters, etc.)					
DEP RESPONDER INFORMATION					
Name: Scott Beaudway			Title: AQS		Phone: 412-417-7952
Mileage (Portal-to Portal): 28		Time (Response + Travel + Documentation + Refitting): 0.0 Reg. Hrs. 4.25 OT Hrs.			
PROGRAM REFERRAL (For Information and/or Follow up)					
Program	Staff Notified	Date	Via		
Air Quality	Beth Speicher, Mark Gorog	2/13/23	<input checked="" type="checkbox"/> Email <input type="checkbox"/> Phone <input type="checkbox"/> In Person		
Clean Water	Stacy Greenwald, Chris Kriley	2/13/23	<input checked="" type="checkbox"/> Email <input type="checkbox"/> Phone <input type="checkbox"/> In Person		

MAPS / PHOTOGRAPHS / ATTACHMENTS

Elevated Flare (C205C)



Elevated Flare (C205C) and HP Ground Flare (C205B)



Elevated Flare (C205C) and HP Ground Flare (C205B)

